

UNITED STATES DISTRICT COURT

for the

Western District of Texas

United States of America

v.

Jesus Guzman-Delgado

Defendant(s)

Case No. SA-23-MJ-1718

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Betw. 6/30/2018 and 10/4/2022 in the county of Comal and elsewhere in the
Western and Southern Districts of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 USC 371 and 554

Conspiracy to Smuggle Goods from the United States

Penalties: Up to 5 Years Imprisonment, \$250,000 Fine, 3 Years
Supervised Release, and \$100 Mandatory Special Assessment.

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

ERIC WATKINS

Digitally signed by ERIC

WATKINS

Date: 2023.12.12 21:29:27 -06'00'

Complainant's signature

Eric Watkins, ATF Special Agent

Printed name and title☐ Sworn to before me and signed in my presence.☒ Sworn to telephonically and signed electronically.Date: 12/13/2023City and state: San Antonio, Texas*Judge's signature*

RICHARD B. FARRER, US MAGISTRATE JUDGE

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Eric Watkins, duly sworn do hereby depose and state:

1. Your affiant has been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since October 2018. Additionally, between April 2014 and October 2018 your affiant was a sworn ATF Task Force Officer, and therefore, since April 2014, your affiant has participated in investigations concerning violations of Titles 18, 21, and 26.
2. The United States, including the ATF, is investigating JESUS GUZMAN-DELGADO and other co-conspirators for illegally exporting goods from the U.S. between approximately June 30, 2018, and October 4, 2022. This criminal conspiracy spans the Western and Southern Districts of Texas and the Republic of Mexico.
3. Your affiant identified a common means and method of the conspiracy that consists of a co-conspirator in New Braunfels, Texas, in the Western District of Texas purchasing and preparing AR-15 parts (including magazines and all parts/pieces necessary to complete functioning AR-15 rifles) for transport to Laredo, Texas, in the Southern District of Texas. Once the parts arrived in Laredo they were retrieved by Mexican citizens working as truck drivers, who acted as couriers for the conspiracy. The drivers concealed the firearm parts amongst legitimate cargo and smuggled the firearm parts into Mexico without notifying U.S. or Mexico customs officials.
4. During the investigation, agents received information that Jesus GUZMAN-Delgado was a truck driver who transported firearm parts in furtherance of the conspiracy. On December 12, 2023, GUZMAN-Delgado crossed from Mexico into the United States while working as a truck driver. Agents arrived at the Laredo point of international entry and requested to speak with GUZMAN, who agreed to speak with them.
5. During the interview, GUZMAN verbally waived his Miranda Rights and admitted that he once worked for the same Mexican trucking company as several other drivers this investigation has identified as smuggling gun parts for the conspiracy. GUZMAN admitted that on one occasion he received two boxes from a co-conspirator in Laredo containing AR-15 magazines and springs. GUZMAN identified buffer springs from a photograph of AR-15 buffer parts/pieces as the springs he found in the box. GUZMAN admitted he concealed the firearm parts amongst legitimate cargo and transported the parts across the international border without notifying any U.S. or Mexican customs officials because he knew the act was illegal. GUZMAN transported the parts to the co-conspirator in the Apodaca, Mexico area, near Monterrey, Nuevo Leon, and received a payment of 1,000\$ Mexican Pesos per box.

6. Agents know this is a consistent payment and drop off location for drivers involved in the same conspiracy. Agents also know the acts described by GUZMAN occurred during the investigative timeframe.
7. On December 12, 2023, a Department of Commerce Licensing Officer preliminarily confirmed that AR-15 magazines are controlled items and cannot be legally exported from the United States without authorization. Additionally, GUZMAN does not have a license to export firearm parts from the United States, nor do any of the other co-conspirators identified during this investigation.
8. Based on the above facts, your affiant believes there is probable cause that Jesus GUZMAN-Delgado violated 18 U.S.C. § 371 and 554.

ERIC WATKINS Digitally signed by ERIC WATKINS
Date: 2023.12.12 21:29:43 -06'00'

Special Agent Eric Watkins
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to telephonically and signed electronically on December 13, 2023.



Honorable Richard B. Farrer
United States Magistrate Judge